



Supplier Code of Conduct

May 2026



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CEO

DocuSigned by:
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is Southeast Asia's largest community of **455,000+** healthcare professionals (HCPs), **connecting 3 out of 4 doctors in the region**



We have offices in Singapore, Abu Dhabi, India, Indonesia, Malaysia, Taiwan, Thailand, the Philippines and Vietnam.

300+

Medical Associations delivering more than 6 million CME credits to doctors

120+

Healthcare Enterprises reaching, educating and gaining insights into HCPs

7+

Docquity Markets and expanding to Japan, Brazil and Mexico

OUR VISION

Is to connect healthcare professionals to build healthier lives around the world at scale.

OUR MISSION

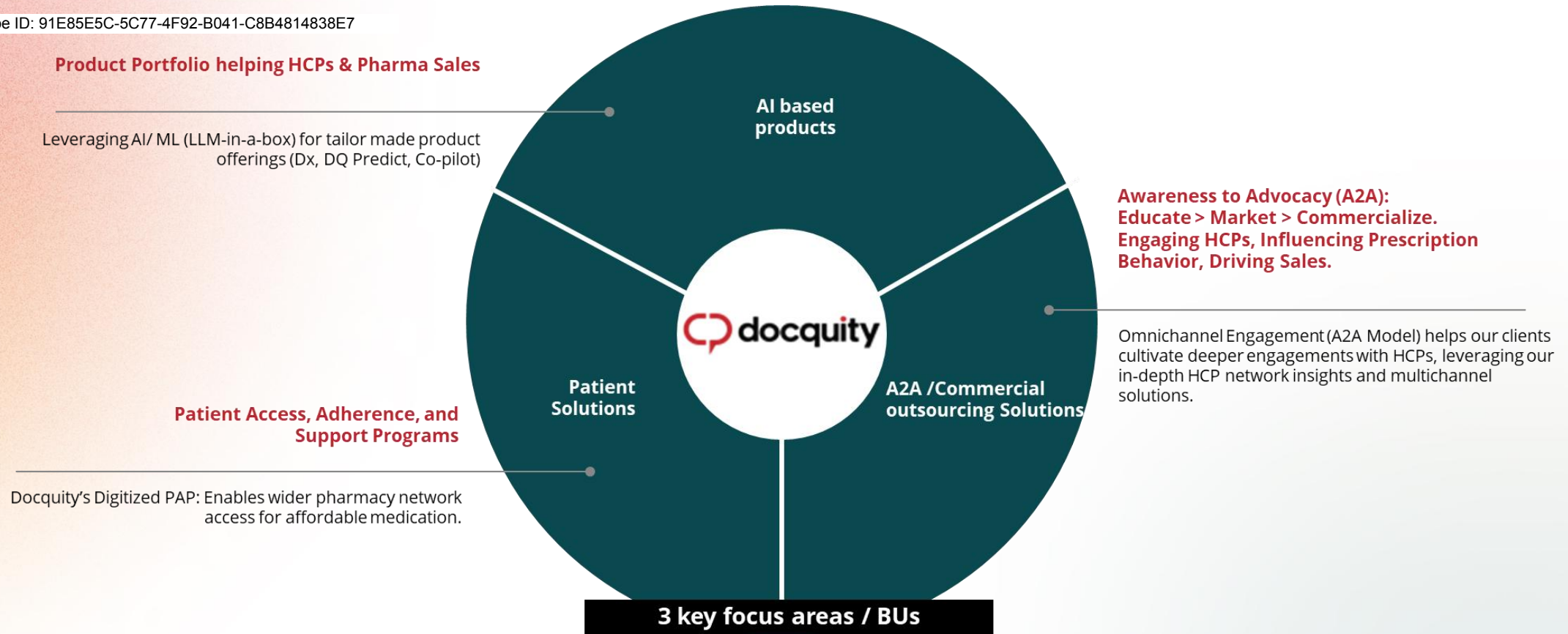
Is to help healthcare professionals be more collaborative, productive and impactful as a community through technology.

Docquity Context

The Company operates a leading digital healthcare professional (HCP) interaction and engagement ecosystem across South-east Asia, complemented by advanced clinical intelligence, patient support, and commercial outsourcing services for pharmaceutical and life sciences organizations. Key aspects of the Company's operating model that are relevant for Suppliers include:

- A **verified network of licensed healthcare professionals**, with access controls and validation processes to ensure platform participation is restricted to eligible HCPs
- Delivery of **educational, scientific, and professional development content**, including CME/CPD-accredited programs, with clear separation from promotional or commercial activities
- Design and management of **patient support programs (PSPs)** focused on education, adherence, access, and affordability, delivered in collaboration with pharmaceutical clients and healthcare stakeholders
- Operation of **Dx**, an AI-powered, evidence-based clinical search and decision-support platform designed for licensed clinicians, providing access to peer-reviewed medical literature, global and national clinical guidelines, differential diagnosis support, and patient education resources while explicitly not replacing professional medical judgment or local standards of care
- **Data-driven digital engagement and insights solutions** supporting ethical, compliant HCP outreach and life sciences collaboration, with emphasis on transparency, responsible use of analytics, and regulatory compliance
- Operations across multiple jurisdictions with **cross-border data processing**, requiring strong data privacy, cybersecurity, anonymization, encryption, and regulatory controls

Suppliers supporting any of these activities are expected to understand the heightened ethical, regulatory, data protection, and healthcare compliance



Tailored Solutions: Meeting the Demands of the Healthcare Industry

01 Our Network

SEA's largest network of Healthcare professionals

- Engage on the Docquity platform
- Leverage relationship with medical associations

02 Our Data

We have adopted AI & ML tools to understand HCPs

- Specialty breakdown
- Persona
- Preferences
- Behavior
- Unique Segmentation

03 Our Execution

We leverage science & execute efficiently across channels

- Strong HCP interactions
- Omnichannel outreach
- AI Medical content
- Closed loop Marketing
- Strong KOL Mgt
- Co-pilot / DQ Engage

04 Our Analytics

We provide real time and advanced insight & analytics

- Unique HCP insight
- Brand attitude (ITP)
- DQ Predict
- Activity tracking (dashboards)
- Measure success/ROI

Our Supplier Code of Conduct

This Supplier Code of Conduct (“Code”) defines the minimum ethical, legal, regulatory, and operational standards applicable to all third parties providing goods or services to the Company, including suppliers, vendors, contractors, consultants, agents, intermediaries, and distributors (collectively, “Suppliers”). It applies across all business activities, including

- Digital platform vendors (SaaS, cloud, analytics)
- Patient Support Program (PSP) partners and field agencies
- Healthcare professional (HCP) engagement and content partners
- Marketing, A2A, B2B, and B2C service providers
- Data processors, subcontractors, and technology partners

Suppliers must:

- Comply with this Code and all applicable laws and regulations
- Uphold standards relating to business integrity, human rights, health and safety, environmental responsibility, and data protection
- Ensure that equivalent standards are implemented across their own subcontractors and supply chain

This Code establishes a baseline of expectations and does not limit Docquity’s right to impose more specific or stringent requirements through contracts, policies, or applicable regulatory obligations.

Failure to comply with this Code may result in corrective actions, suspension, termination of the business relationship, and/or legal remedies, as appropriate.

Ethical Business Conduct (1) [\(2\)](#)

Supply Chain Integrity

Risk-Based Supplier Management

Human Rights and Labor Standards

Healthcare Compliance and Ethical Promotion

Environmental Responsibility

Data Privacy, Information Security, and Cybersecurity

Legal and Regulatory Compliance

Intellectual Property and Copyright

Business Continuity, Monitoring, and Right to Assess

Workforce Training and Competence

Reporting, Whistleblowing, and Non-Retaliation



**Operate with Integrity
& transparency**

Ethical Business Conduct

Suppliers shall **conduct business with the highest standards of integrity and professionalism**

Anti-Bribery and Anti-Corruption

- Prohibit all forms of bribery, kickbacks, facilitation payments, or improper advantages
- Do not offer, promise, give, or accept anything of value to improperly influence business decisions
- Maintain transparent and accurate records of all transactions

Anti-Trust & Fair Competition

- Conduct business in compliance with applicable anti-trust and competition laws
- Avoid collusion, price-fixing, bid-rigging, or abuse of market position
- Not exchange sensitive information with competitors without lawful justification
- Not abuse a dominant market position or engage in unfair trade practices
- Ensure that participation in industry forums, trade associations, or collaborations does not result in anti-competitive conduct

Conflict of Interest

- Avoid situations where personal, financial, or other interests could conflict with the Company's interests
- Disclose any actual or potential conflicts of interest promptly

Entertainment, Gifts, Hospitality, and Sponsorships

- Comply with applicable healthcare industry codes, ethical marketing practices, and local regulations governing pharma and device related activities
- Ensure that any gifts, hospitality, sponsorships, donations, or benefits offered to healthcare professionals, healthcare organizations, patients, or patient groups are lawful, modest, transparent, appropriately documented, and not intended to improperly influence clinical, prescribing, purchasing, or referral decisions
- Ensure all sponsorships and educational or patient support initiatives are based on legitimate business or scientific needs and are not promotional in nature unless expressly permitted by law and contract

Ethical Business Conduct [\(1\)](#) [\(2\)](#)

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Anti-Money Laundering

- Comply with applicable anti-money laundering (AML), counter-terrorist financing (CTF), and economic sanctions laws.
- Not engage in, facilitate, or support money laundering, terrorist financing, or dealings with sanctioned individuals, entities, or jurisdictions
- Conduct appropriate due diligence on customers, subcontractors, and intermediaries, where relevant
- Maintain adequate controls and monitoring to detect and prevent suspicious transactions
- Ensure that funds used in business transactions are derived from legitimate sources
- Promptly report any suspicious activities or sanctions concerns that may impact the Company

Financial Integrity & Fraud Prevention

- Maintain accurate, complete, and auditable books, financial records and statements, in accordance with applicable laws and accounting standards
- Ensure that all invoices, billing practices, and financial claims are truthful, substantiated, and contractually aligned
- Prohibit and prevent fraud, misrepresentation, falsification of records, or any form of financial misconduct
- Implement appropriate internal controls and approval mechanisms to prevent errors, misuse of funds, or unauthorized transactions
- Ensure that all payments, commissions, rebates, discounts, or incentives are transparent, properly documented, and compliant with applicable laws and anti-corruption requirements
- Support audit, inspection, and verification processes by providing access to relevant financial records, where contractually required
- Promptly report any suspected financial irregularities, fraud, or control weaknesses that could impact the Company, its clients, or healthcare stakeholders.

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Supply Chain Integrity

Safety, Quality, and Traceability Across the Value Chain

Suppliers involved in *service delivery, content development, technology support, data processing, or any operational activities* shall ensure **high standards of quality, integrity, & traceability** across the supply chain.

- Comply with applicable quality standards and regulatory requirements, including relevant Good Practice frameworks such as Good Distribution Practice (GDP), and other applicable quality or service standards depending on the nature of services
- Implement and maintain quality management systems, validation processes, and controls to ensure consistency, reliability, and compliance of services, content, platforms, and outputs
- Take measures to prevent data manipulation, content adulteration, unauthorized alterations, or integrity compromises
- Ensure the integrity of their supply chain by preventing fraud, counterfeiting, impersonation, unauthorized access, or misuse of systems
- Promptly identify, document, and report any quality issues, deviations, non-conformances, or risks that could impact service quality, patient safety, regulatory compliance, or client deliverable



Supplier Governance

Risk-Based Supplier Management

Suppliers shall apply a **risk-based approach to supplier governance**

- Subject high-risk suppliers to enhanced due diligence, controls, training, audits, or certifications
- Not engage subcontractors without prior authorization, where required, and shall ensure that all subcontractors comply with standards equivalent to this Code

Suppliers remain fully accountable for their subcontractors and downstream partners

Ethical Business Conduct [\(1\)](#) [\(2\)](#)

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**Respect
human rights**

Human Rights and Labor Standards

Suppliers shall **uphold internationally recognized human rights standards**, including the UN Guiding Principles on Business & Human Rights and applicable International Labor Organization (ILO) conventions

Employment Practices

- Prohibit child labor, forced labor, bonded labor, or human trafficking in any form
- Ensure employment is voluntary and workers are free to leave employment subject to applicable laws
- Comply with applicable wage, working hour, social security, and statutory benefit laws across all operating jurisdictions

Workplace Respect & Non-Discrimination

- Provide a workplace free from discrimination, harassment, abuse, intimidation, or retaliation
- Respect diversity, equity, and inclusion regardless of gender, age, nationality, ethnicity, religion, disability, sexual orientation, veteran status, or any other legally protected characteristic

Health and Safety

- Provide a safe, secure, and healthy working environment
- Implement occupational health and safety management systems aligned with recognized standards
- Take proactive measures to prevent workplace injuries, illnesses, and unsafe conditions

Ethical Business Conduct [\(1\)](#) [\(2\)](#)

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Healthcare Compliance and Ethical Promotion

Suppliers shall **safeguard Integrity in Every Healthcare Interaction**

Commit to patient safety & public health

- Comply with applicable healthcare compliance frameworks (local codes governing pharma - HCP interactions)
- Ensure that engagements with HCPs are ethical, transparent, and based on legitimate scientific or service need
- Strictly prohibit any inducement, off-label promotion, inappropriate hospitality, or benefits to influence prescribing, purchasing, or recommendation decisions
- Ensure patient-centricity and ethical conduct in all patient support programs



Environmental Responsibility

Suppliers shall **operate in an environmentally responsible and resource-efficient manner**

Comply with environmental laws

- Comply with applicable environmental laws, permits, and regulations
- Minimize environmental impact through responsible waste management, resource efficiency - environmental impact should be applied proportionate to the nature of services, operational footprint, and associated environmental risks.
- Work towards environmentally sustainable practices aligned with relevant industry standards

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Data Privacy, Information Security, and Cybersecurity

Suppliers shall **ensure Data Security, enable an environment of Trust, and Maintain Compliance as per Global Standards**

Data Protection & Privacy

- Protect confidential, proprietary, and personal data against unauthorized access, loss, misuse, alteration, or disclosure
- Comply with applicable data protection and privacy regulations
- Process data lawfully, fairly, and for defined purposes
- Use personal data strictly for legitimate, documented, and contractually authorized purposes
- Observe restrictions on cross-border data transfers and ensure lawful transfer mechanisms, approvals, and safeguards are in place
- Implement technical and organizational measures (including for Artificial Intelligence, where applicable) aligned with internationally recognized standards such as ISO/IEC 27001, ISO/IEC 27701, and applicable Personal Information Management System (PIMS) requirements
- Promptly notify the Company of any actual or suspected data breach, cybersecurity incident, or loss of data, and cooperate fully in investigation and remediation



Legal and Regulatory Compliance

Suppliers shall **operate Responsibly Across Laws, Regulations, & Jurisdictions**

Comply with Legal & Regulatory Obligations

- Comply with applicable international, national, and local laws, regulations, and industry standards
- Adhere to healthcare-specific laws, including those governing interactions with HCPs, patients, and healthcare institutions
- Comply with anti-bribery, anti-corruption, anti-money laundering, competition, and trade control laws

Where legal requirements and this Code differ, the higher standard shall apply

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Respect IP & Copyright

Intellectual Property and Copyright

Suppliers shall **respect Ownership and protect Innovation**

- Use Docquity's intellectual property only for authorized purposes and in accordance with contractual agreements
- Ensure that all deliverables, content, and materials created or used do not infringe on the IP rights of third parties
- Obtain and maintain appropriate licenses, permissions, or rights for any third-party content, software, or materials used in delivering services
- Protect confidential and proprietary information from unauthorized use, copying, distribution, or disclosure
- Avoid unauthorized reproduction, distribution, or modification of copyrighted materials, including medical content, publications, software, or digital assets
- Promptly report any suspected or actual IP infringement, misuse, or unauthorized disclosure affecting the Company or its clients



Continuity That Withstands Disruption

Business Continuity, Monitoring, and Right to Assess

Suppliers shall **ensure Resilience, Transparency, & Continuous Oversight**

- Suppliers supporting critical operations shall:
 - Maintain documented business continuity and disaster recovery plans appropriate to the services provided
 - Ensure continuity of services, particularly for patient support, digital platforms, & healthcare-related activities
 - Implement risk identification and mitigation measures to minimize disruptions to critical services
- Suppliers understand that Docquity reserves the right to:
 - Monitor compliance, conduct audits, & request relevant information to verify adherence to this Code
 - Require corrective action plans where gaps are identified and track remediation to closure

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Capability & Readiness

Workforce Training and Competence

Suppliers shall **ensure Skilled, Informed, and Compliant Workforce** for effective and ethical performance

Suppliers shall ensure that their personnel, including employees, agents, and subcontractors, are appropriately trained, qualified, and competent to perform their roles in compliance with this Code and applicable laws.

- Ensure personnel involved in healthcare, patient engagement, content creation, or HCP interactions are adequately trained on regulatory and ethical requirements
- Maintain records of training, certifications, and competency assessments to demonstrate compliance and readiness
- Ensure that personnel possess the necessary qualifications, skills, and experience to perform assigned tasks effectively and safely
- Provide refresher training and updates in response to regulatory changes, client requirements, or identified risks
- Promote awareness of this Supplier Code of Conduct and ensure that relevant personnel understand their responsibilities under it



Ethics Reporting & Non-Retaliation

Reporting, Whistleblowing, and Non-Retaliation

Suppliers shall **build a Culture of Integrity and Safe Reporting**

- Promptly report any actual or suspected violations of this Code, applicable laws, or contractual obligations by visiting [Docquity Ethics & Integrity Reporting Form](#)
- Support non-retaliation principles and protect individuals who raise concerns in good faith
- Cooperate fully with investigations and remediation efforts

Let's collaborate and improve healthcare outcomes together!

For questions or inquiries, contact us at dpo@docquity.com



Sources

Human rights & labour → UNGP, ILO
Ethics & anti-corruption → FCPA, UK Bribery Act, OECD
AML → FATF (Financial Action Task Force)
Competition law → OECD
Healthcare compliance → IFPMA, EFPIA, PhRMA
Privacy & security → GDPR, PDPA, ISO 27001/27701
AI governance → OECD AI, NIST AI RMF, WHO
Environment → ISO 14001, SDGs